

# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA

[This form is for prisoners to sue for civil rights violations. NEATLY print in ink (or type) your answers.]

LARRY FARLEY

[You are the PLAINTIFF, print your full name on this line.]

v.

Bradford et al.

[The DEFENDANT is who you are suing. Put ONE name on this line. List ALL defendants below, including this one.]

Scanned at WCF and Emailed  
on 7/25/23 by NB 44 pages

Case Number 3:22-CV-01010-DRL-JPK

[For a new case in this court, leave blank.  
The court will assign a case number.]

[The top of this page is the caption. Everything you file in this case must have the same caption. Once you know your case number, it is VERY IMPORTANT that you include it on everything you send to the court for this case. DO NOT send more than one copy of anything to the court.]

## PRISONER COMPLAINT

#	Defendant's Name and Job Title	Work Address
1	[Put the defendant named in the caption in this box.] LT Robert Bradford for Westville Nathanial Ward Counselor RWI Westville John Golipeau Warden of Westville	5501 S. 1100 W. Westville, IN 46391
2	[Put the names of any other defendants in these boxes.] C.O. Corley AM Shift for Westville James Jackson Doctor for Westville Nicole Bridegroom Director	5001 S. 1100 W. Westville, IN 46391
3	P. Rogers Nurse for Westville Nicholas pazera RWI Director Centurion Health care provider	Centurion Health only 9245 N. Meridian street Suit 111 Indianapolis, IN 46260

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and work address of each defendant in a separate box as shown here.]

- How many defendants are you suing? 9
- What is the name and address of your prison or jail? Westville correctional facility 5501, south 1100 West Westville, IN 46391
- Did the event you are suing about happen there? ☒ Yes. ☐ No, it happened at: Westville correctional facility
- On what date did this event occur? 8-29-2023 - ONGOING

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

CLAIMS and FACTS

DO: Write a short and plain statement telling what each defendant did wrong.

DO: Use simple English words and sentences.

**DO NOT:** Quote from cases or statutes, use legal terms, or make legal arguments.

DO: Explain when, where, why, and how each defendant violated your rights.

DO: Include every fact necessary to explain your case and describe your injuries or damages.

DO: Number any documents you attach and refer to them by number in your complaint.

**DO NOT:** Include social security numbers, dates of birth, or the names of minors.

DO: Use each defendant's name every time you refer to that defendant.

DO: Number your paragraphs. [The first paragraph has been numbered for you.]

- (1) Exhibit one (1) shows what Lt. Robert Bradford did and did not do to protect my safety.
- (2) Exhibit two (2) shows how my counselor, Nathaniel Ward, failed to ensure a reasonable level of protection by not enhancing the safety measure to compensate for my disability. By all parties failing to do so my jaw was broken as a result. There after several occasions I was subjected to pain and suffering.
- (3) Exhibit three (3) will talk about Warden John Galipeau and his essential duties/responsibilities. He is responsible for creating and maintaining a safe, productive, harmonious and positive living/work place, food service, healthcare, including security. He is responsible for the safety of all offenders. Errors in judgment could result in state liability and/or critical incidents causing death or injury. John Galipeau failed to take me seriously and I got hurt and denied transfer to JCU Correctional, a level 1 Facility, and I contracted Salmonella poisoning. I was denied adequate medical treatment.
- (4) Exhibit four (4) will show how C.O. Corely failed to protect me or send me to ~~JCU Correctional~~ <sup>HCU/Hospital</sup> when clearly you could see that I needed help and safety protection.



5. When did this event happen?

- ☐ Before I was confined.  
☐ While I was confined awaiting trial.  
☒ After I was convicted while confined serving the sentence.  
☐ Other: \_\_\_\_\_

6. Have you ever sued anyone for this exact same event?

- ☒ No.  
☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

7. Could you have used a prison grievance system to complain about this event?

- ☐ No, this event is not grievable at this prison or jail.  
☒ Yes, I filed a grievance and attached is a copy of the response from the final step.  
☐ Yes, this event was grievable, but I did not file a grievance because \_\_\_\_\_

8. If you win this case, what do you want the court to order the defendant(s) to do?

[NOTE: A case filed on this form will not overturn your conviction or change your release date.]

Give me 1,200,000 and To change my code back To AN A code from G2-BH-F code There is no way To have copd? High blood pressure Then clear of all and all illness and send me back To level one JCU IN Indianapolis Johns count, Because it was there mistake That kept me here.

[Initial Each Statement]

- LF I will pre-pay the filing fee OR file a prisoner motion to proceed in forma pauperis.  
 LF I will keep a copy of this complaint for my records.  
 LF I will promptly notify the court of any change of address.  
 LF I WILL NOT send more than one copy of any filing to the court.  
 LF I WILL NOT send summons, USM-285, or waiver forms to the clerk.  
 LF I declare under penalty of perjury that the statements in this complaint are true.

I placed this complaint in the prison mail system on 7/10/2023 at 2:30 am/pm  
 [Do not fill in this date and time until you give the complaint to prison officials to send to the court.]

Larry Farley  
 Signature

950773  
 Prisoner Number